Responses to Questions Regarding the Request for Proposals to Provide Aquatic Toxicity Testing Services

The 2020 Delta Regional Monitoring Program (RMP) Request for Proposals (RFP) to Provide Aquatic Toxicity Testing Services was posted to https://www.sfei.org/DeltaRMP on November 5, 2020. Below are responses from the Delta RMP Toxicity Laboratory Selection Subcommittee (Selection Subcommittee) to questions regarding this RFP, which were due November 11, 2020. For ease of review, specific questions are underlined to highlight them within the additional contextual narrative. Proposals to Provide Aquatic Toxicity Testing Services are due to Delta RMP Technical Advisory Committee Co-Chair Melissa Turner (mturner@mljenvironmental.com) by 5 PM on November 30, 2020.

Q1. The Service Requirements (page 5) and Proof of Quality (page 10) of the RFP identifies the routine tests for the Delta RMP, which does not include the chronic fathead minnow test. However, the Evaluation Process indicates that labs are required to be accredited for this test (page 12), the fathead minnows reference toxicant data and control CVs are noted as part of the Evaluation Procedures (page 13 and page 23), data entry is required for this protocol in Attachment C, and the method is listed in the Attachment D Cost Entry Form. Should this test have been included in the routine testing (page 5) and Proof of Quality (page 10), or should all of the other requirements for data and costs for this test have been excluded from the RFP?

ANSWER: The fathead minnow toxicant test should have been listed on pages 5 and 10, please provide these requested data in your proposal.

Q2. The RFP only requests DMRQA data for years 2017-2019. However, the results from DMRQA 40 are now available. If proposing labs have the 2020 data available, are they encouraged to submit their DMRQA 40 report as well?

ANSWER: Please provide DMRQA results for years 2017-2019, and include 2020 if it is available. The Selection Subcommittee acknowledges that some labs may not have the 2020 results.

Q3. In the Proof of Quality section under item 2, proficiency testing data is requested for the years 2017-2019 (Studies 37-39). Results from 2020 (Study 40) are now available. Is it preferable to include the 2017-2019 studies or the 3 most recent studies (38-40)?

ANSWER: Please provide DMRQA results for years 2017-2019, and include 2020 if it is available. We acknowledge that some labs may not have the 2020 results.

Q4. Regarding QC data for the *Chironomus dilutus* and *Hyalella azteca*, the RFP indicates that 10-sediment survival data is acceptable to include in the control chart submittal for these species. Is it acceptable to also include 20-day *C. dilutus* and 28-day *H. azteca* survival data from testing performed following EPA methods 100.4 and 100.5 as well?

ANSWER: 28-day or 20-day data are acceptable in addition to or instead of 10-day data for the *Hyalella* and midge control data, respectively. Control survival data for tests of 10-days or more (e.g., 10-day or 20-day tests/endpoints) can receive up to two additional points compared to the maximum points for only submitting 96-hour control survival data. Maximum points for *Hyalella* and midge control performance will be awarded for survival ≥90%.

Q5. In Attachment B, the Qualitative Evaluation Table on page 22 requests the SOP for "*Ceriodaphnia dubia* 10-day water column dual-endpoint test for survival and growth SOP." Can you please confirm that this is

actually for the "*Ceriodaphnia* 7-day dual-endpoint test for survival and reproduction", and that extended test duration and measurement of growth are not required?

ANSWER: Yes, Attachment B should consistently refer to the *C. dubia* 7-day dual-endpoint test for survival and reproduction.

Q6. In Attachment B, the Quantitative Evaluation Table on page 23 references EPA 2000 and EPA 2010. For the sake of clarity, could you please provide the full document titles?

ANSWER: These documents are:

- USEPA 2000: Understanding and Accounting for Method Variability in Whole Effluent Toxicity Applications Under the National Pollutant Discharge Elimination System Program. EPA 833-R-00-003. June.

- USEPA 2010: National Pollutant Discharge Elimination System Test of Significant Toxicity Technical Document. Office of Wastewater Management. EPA 833-R-10-004. June.

Q7. Page 7 of the RFP indicates that Standard Operating Procedures (SOPs) are a required element of each EDD report. It has been our experience that SOPs are not submitted along with CEDEN EDDs, but rather laboratory SOPs are submitted for QAPP updates. Please clarify what is intended to occur regarding the EDD report and SOP submittals noted on page 7.

ANSWER: The Selection Subcommittee agrees that SOPs are not necessary to submit with every EDD, but this requirement is currently listed in the Delta RMP QAPP. We appreciate this feedback and have noted this discrepancy to correct in the 2020-2021 QAPP. After the QAPP requirement is updated, submitting SOPs will no longer be required with each EDD.

Q8. The RFP requires submittal of SOPs for TIE methods. The Delta RMP TIE testing (QAPP Section 13.2.5) lists a phased TIE approach with TIEs focusing on pesticides via the application of the following methods: baseline, EDTA, centrifugation, solid phase extraction (C-8 or C-18), PBO, and carboxylesterase. The QAPP listed various other TIE treatments that may be required by the TIE Subcommittee if the initial TIE treatments are not successful in removing or amplifying toxicity. Please advise if we are required to submit SOPs in our proposal only for baseline, EDTA, centrifugation, solid phase extraction (C-8 or C-18), PBO, and carboxylesterase methods since they are the TIE methods applied to first evaluate causes of toxicity, or if additional TIE method SOPs should also be submitted.

ANSWER: SOPs for only the five initial TIE treatments are requested and will be sufficient for the Selection Subcommittee to compare proposals.

Q9. Is pathogen effect taken into consideration when making decisions regarding TIE follow-up testing?

ANSWER: Yes, pathogen effects are considered in TIE follow-up testing; the Delta RMP will consider input and recommendations from the selected lab when making decisions for any follow-up testing.

Q10. The Cost-entry form only has a line-item for a "*C. dubia* secondary control". Per section 4 of the RFP, "unit costs should also be included for secondary controls that may be required when water quality conditions are outside, or approaching the test organism's tolerance limit."

A. Should there be additional line items for secondary controls for the additional test species used for the Delta RMP (e.g. SWAMP MQO lower conductivity limit for fathead minnows is listed as 100 µS/cm)?

ANSWER: Only costs for *C. dubia* secondary controls are required. Additional information about secondary controls can be provided in the comments section of Attachment C.

B. What constitutes "approaching a tolerance limit"?

ANSWER: The current procedures describing how secondary controls are used when sample conductivity approaches tolerance limits for *C.dubia* are described in the QAPP Section 13.2.2 Toxicity Testing Procedures, in particular Figure 13.1.

Q11. For pricing on the Cost Entry Form associated with the Phase I TIEs: Are proposing labs to assume that all possible TIE sample manipulations and testing listed in section 13.2.5 of the QAPP be included in the unit cost for each species, or should the pricing only reflect the species-specific TIE manipulations and testing outlined in table 26.1 of the QAPP?

ANSWER: Please describe the costs for each species to conduct all initial (Phase I) TIEs treatments listed in Table 26.1.

Q12. The Price/Payment section (page 7) of the RFP indicates that each individual test will include all costs associated with sample analyses, including but not limited to lab testing/analyses, all reporting Case Narratives, QA/QC evaluations, and CEDEN EDDs. However, the Attachment D Cost Entry Form includes separate cost entries for CEDEN EDDs and Reporting. Please advise if the tests costs on the Cost Entry Form are or are not to include EDDs and reporting fees.

ANSWER: It is at the discretion of the labs whether to include reporting costs in EDDs or provide these costs separately. Please provide any needed explanation in the comments section of Attachment D. If EDD costs are included in the cost of running the test, the EDD cost line item would be $0. Only the Total Cost of the proposals will be scored, scoring will not be on a line item-basis.

Q13. Should prices presented on the cost entry form reflect the test designs presented in the SWAMP MQO or does the Delta RMP intend to increase the minimum number of replicates per test to mitigate potential false-positives resulting from pathogen-effect?

ANSWER: Please follow the SWAMP MQOs.

Q14. The link for Attachment C and Attachment D could not be accessed, per screen capture below. Please advise when this will be accessible.

ANSWER: In case there are difficulties in accessing the Google Sheets via the link in the pdf, below are the links to Attachment C and D:

- Attachment C: https://docs.google.com/spreadsheets/d/1YHgTUcCWbLxaz-p-pUwrnLWcRImSy5xw/template/preview
- Attachment D: https://docs.google.com/spreadsheets/d/1Ng6WgLxtp-xZTOh5rExcf1Ah7SZuKYqR/template/preview